

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

IN RE REGIONS MORGAN KEEGAN)	
SECURITIES, DERIVATIVE and ERISA)	
LITIGATION)	
)	Case No. 2:09-md-02009-SHM
This Document Relates to:)	
)	
<i>In re Region Morgan Keegan ERISA Litig.,</i>)	
No. 2:08-cv-2192-SHM-dvk)	
_____)	

**JOINT STIPULATION AND [PROPOSED] ORDER FOR ENTRY
OF A REVISED SCHEDULING ORDER**

In light of recent events in this action, the parties respectfully submit this Joint Stipulation and Proposed Order for Entry of a Revised Scheduling Order.

WHEREAS previously, on December 20, 2011, the Court granted the Parties' Joint Motion for Scheduling Order, setting forth the following schedule for briefing on a motion to dismiss: Defendants have forty-five days from the date of Lead Plaintiffs' filing the Third Amended Complaint to file any motions to dismiss that Complaint; Lead Plaintiffs' response shall be due forty-five days after Defendants file their motions to dismiss; and any optional reply by Defendants shall be due thirty days after the response is filed. (Doc. 209.)

WHEREAS, given certain corrections recently made by Plaintiffs to the Third Amended Complaint, the Parties, having conferred, stipulate to, and hereby propose to the Court the following amended schedule:

1. Defendants shall have until August 8, 2011, to file a motion to dismiss or answer with respect to the Third Amended Complaint.

2. With respect to any motion to dismiss, Lead Plaintiffs' opposition shall be due forty-five days after Defendants file their motions to dismiss
3. Defendants shall have thirty days after Lead Plaintiffs file their opposition to file any reply in support of their motion to dismiss.

WHEREAS on April 22, 2011, the Court entered a Minute Entry setting forth the briefing deadlines for Plaintiffs' motion for class certification. (Doc. 221.)

WHEREAS, given the status of document production, and motions practice referenced above, the Parties, having conferred regarding a proposed schedule, stipulate to, and hereby propose to the Court the following amended schedule with regard to class certification:

1. [November 4, 2011] - Deadline for Lead Plaintiffs to move for class certification. If Lead Plaintiffs have not received sufficient discovery regarding class certification, the Parties will confer and propose a revised schedule subject to the Court's approval.
2. [January 10, 2012] (or 60 days following Plaintiffs' motion for class certification, whichever is later) – Deadline for Defendants' responses to Plaintiffs' motion for class certification.
3. [March 12, 2012] (or 60 days following Defendants' responses to Plaintiffs' motion for class certification, whichever is later) – Deadline for Plaintiffs' reply in support of their motion for class certification.

IT IS SO STIPULATED.

ORDER

The Stipulation of the parties is hereby GRANTED.

It is so ORDERED this ____ day of _____, 2011.

SAMUEL H. MAYS, JR.
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that I have on July 15, 2011, filed the STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFFS TO FILE A SECOND AMENDED COMPLAINT electronically with the Clerk of Court, which will send notification of such filing to counsel in this matter.

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